

1 Ethan Jacobs (SBN 291838)
2 ethan@ejacobslaw.com
ETHAN JACOBS LAW CORPORATION
3 100 Pine Street, Suite 1250
San Francisco, California 94111
4 Tel.: (415) 275-0845

5 James M. Slater (admitted *pro hac vice*)
6 james@slater.legal
SLATER LEGAL PLLC
7 2296 Henderson Mill Rd. N.E. #116
Atlanta, Georgia 30345
8 Tel.: (404) 458-7283

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10 *Attorneys for Plaintiff*
Miriam Goldberg

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12 **UNITED STATES DISTRICT COURT**
13
NORTHERN DISTRICT OF CALIFORNIA
14

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16 MIRIAM GOLDBERG,
a/k/a Marina Sokolovskaya,

17 Case No.: 3:24-cv-04525-LJC

18 Plaintiff,

19 v.

20 TEACHBK, INC., ILYA KISELEV and
ANDREI BURTSEV,

21
**DECLARATION OF JAMES M.
SLATER IN SUPPORT OF
PLAINTIFF'S MOTION FOR
SANCTIONS AGAINST DEFENDANT
ILYA KISELEV**

22 Defendants.

1 I, James M. Slater, declare as follows:

2 1. My name is James M. Slater. I am over the age of 18, and I have personal
3 knowledge of the facts set forth in this declaration.

4 2. I am lead counsel for Plaintiff Miriam Goldberg in the above-referenced
5 case. The purpose of this declaration is to provide factual support for the assertions in
6 Plaintiff's Motion for Sanctions against Defendant Ilya Kiselev concerning his
7 noncompliance with the Court's Discovery Order. [ECF No. 63].

8 3. That Discovery Order required Defendants Ilya Kiselev and Andrey
9 Burtsev to provide complete communications with the Federal Bureau of Investigation
10 by September 19, 2025. [*See id.*]. It also required Mr. Kiselev to provide better answers
11 to Requests for Admissions Nos. 1-7 by the same date. [*See id.*].

12 4. Previously, on September 20, 2025, I provided a verified notice of Mr.
13 Kiselev's noncompliance with the Discovery Order. [ECF No. 65]. I affirm that the
14 statements I made in that notice are true and correct.

15 5. On December 8, 2025, the parties mediated this dispute, resulting in an
16 impasse.

17 6. Immediately following mediation, I emailed Defendants and explained to
18 Mr. Kiselev that he had failed to (1) confirm that he had provided a complete
19 production with respect to any communications with the FBI (previously Mr. Burtsev
20 provided additional communications in the thread that was already produced, by Mr.
21 Kiselev had ignored requests for him to confirm that there were no other
22 communications in his possession), and (2) provide better answers to Requests for
23 Admissions Nos. 1-7, as required by the Discovery Order. I also invited him to meet
24 and confer with me by telephone on that week.

25 7. Mr. Kiselev responded that same day, informing me that he had provided
26 all written communications in his possession.

27 8. I immediately responded by email that he had still not provided the
28 answers to the requests for admissions.

1 9. On the same date, Mr. Kiselev responded to that email with a list of
2 hyperlinks, asking me to confirm whether my client made certain statements on a
3 video.

4 10. In that email Mr. Kiselev did not respond to the matter of the requests for
5 admissions.

6 11. On the same date, I responded to Mr. Kiselev's email and informed him
7 that if we did not meet and confer that I would need to proceed with Court
8 intervention.

9 12. Mr. Kiselev did not respond to that email.

10 13. On the following date, December 9, 2025, I emailed Mr. Kiselev asking
11 whether we could meet and confer on the requests for admissions, explaining that
12 otherwise Plaintiff would need to file a motion for sanctions.

13 14. Mr. Kiselev responded that same day asking if I planned to respond to his
14 questions about whether my client made certain statements about him, his family, and
15 their apparent departure from the United States to Serbia. He indicated that if I did
16 not plan to respond to these questions, he would inform the Court that I was ignoring
17 his questions.

18 15. I explained that same date that I was not required to respond to inquiries
19 unrelated to the case.

20 16. Mr. Kiselev responded the same date explaining that he disagreed with
21 my position that the video did not relate to the claims in this case, asking whether I
22 would respond to them.

23 17. On December 17, 2025, I emailed Mr. Kiselev again, copying Alla
24 Vorobets, inviting him once again to meet and confer, explaining that this was our last
25 effort to schedule a meet and confer on the issue, and stating that if we could not meet
26 and confer by the end of the week, that Plaintiff would file a motion for sanctions
27 against him on Monday, December 22, 2025.

18. As of the date of signature below, Mr. Kiselev has not provided any further responses by email or otherwise and has not provided supplemental responses to Requests for Admissions Nos. 1-7, as ordered by the Court.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on December 22, 2025 in Atlanta, Georgia.


James M. Slater